

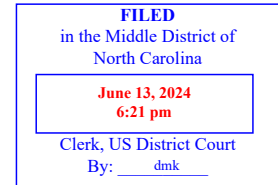
# UNITED STATES DISTRICT COURT

for the

Middle District of North Carolina

United States of America  
v.  
CHRISTOPHER LAWRENCE TURNER

Case No.  
1:24MJ **a43**



Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 12, 2024 in the county of Durham in the  
Middle District of North Carolina, the defendant(s) violated:

*Code Section*

*Offense Description*

18 U.S.C. § 922(g)(1) & 924(a)(8)

Possession of a Firearm by a Convicted Felon

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.

On this day, the applicant appeared before me via reliable electronic means, that is by telephone, was placed under oath, and attested to the contents of this Criminal Complaint and attached affidavit in accordance with the requirements of Fed. R. Crim. P. 4.1.

Date:

6/13/2024

City and state:

Winston-Salem, North Carolina

/s/ Shaylin Laure

*Complainant's signature*

Shaylin Laure, Special Agent, FBI

*Printed name and title*

*Judge's signature*

Joi Elizabeth Peake, U.S. Magistrate Judge

*Printed name and title*

## AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Shaylin Laure, a Special Agent with the Federal Bureau of Investigation, being duly sworn, hereby despose and state as follows:

### Affiant Background

1. I am a Special Agent for the Department of Justice, Federal Bureau of Investigation (DOJ/FBI), and have been so employed for five years. Thus, I am a “Federal Law Enforcement Officer” within the meaning of Federal Rules of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General. As such, I am empowered to conduct investigations of, and to make arrests for, violations of federal law.

2. I am currently assigned to the Raleigh/Durham Safe Streets Task Force (RDSSTF) of the Charlotte field office. As part of my duties, I am responsible for investigation of violations of Federal laws, including those pertaining to violent street gangs and narcotics distribution. Prior to my employment with the FBI, I worked as a deputy for the Kent County Sheriff's Department from 2014 through 2019. Since December 6, 2019, I have conducted and participated in investigations involving physical surveillance, the execution of search warrants, and the execution of arrest warrants. These investigations have led to multiple arrests of individuals involved in illegal

drug activity, firearms violations, and criminal street gangs in Durham, North Carolina.

### Introduction

3. This affidavit is made in support of a complaint against CHRISTOPHER LAWRENCE TURNER of Durham, North Carolina, charging that on June 12, 2024, TURNER committed the following federal offense: possession of a firearm by a convicted felon, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

### Shooting on June 11, 2024

4. On June 11, 2024 at approximately 1:29 a.m., a shooting occurred near the intersection of E. Umstead Street and Fayetteville Street in Durham, North Carolina. The victim of the shooting, hereinafter Victim-1, was shot three times. Victim-1 told police officers on scene that the person who shot her was, “Fat Mama with six kids and lives in a duplex.” Victim-1 described “Fat Mama” as a short, black woman with shoulder length black hair, standing approximately 5’5” tall and weighing approximately 90 pounds.

5. Victim-1 was interviewed at the hospital and told police that the shooting happened because Victim-1 did not want “Fat Mama” to sell drugs around the area where Victim-1 lives because the drugs were killing her friends. Victim-1 also told police that earlier in the day Victim-1 was yelling at “Fat Mama” to shoot her. When the incident occurred, “Fat Mama” pulled up

to the corner of Umstead and Merrick in a burgundy Jeep<sup>1</sup>, walked up to Victim-1, and shot at her. Victim-1 then traveled to a house near Umstead and Fayetteville where she called police.

6. Based on previous interactions, Durham Police Officer B. Evans knew “Fat Mama” to be a nickname for Destiny Daniel. A state arrest warrant was applied for and granted for Destiny Daniel for Assault with a Deadly Weapon with Intent to Kill, in violation of N.C.G.S. § 14-32(c).

#### Surveillance of Destiny Daniel

7. On June 12, 2024, Durham Police Department (DPD) investigators conducted surveillance at the 1400 block of Lincoln Street, Durham, NC. Destiny Daniel’s registered address in the North Carolina DMV database is 1403 Lincoln Street, Durham, NC. DPD Investigators observed a 2008 burgundy Honda Pilot, with a North Carolina registration plate of KME-6693, arrive at 1403 Lincoln Street and pull into the garage. DPD Investigators confirmed that the burgundy Honda Pilot is registered to Destiny Daniel. A short time later, the same Honda Pilot pulled out of the garage and turned north onto Lincoln Street. DPD Investigators conducted mobile surveillance on

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<sup>1</sup> In my training and experience, all SUV style vehicles are commonly referred to as “Jeeps” in Durham, NC.



the Pilot and followed it to Jack's In and Out Mart, located at 911 Fayetteville Street, Durham, NC.

8. When the burgundy Honda Pilot pulled into the parking lot of Jack's In and Out Mart, investigators conducting surveillance were able to positively identify the driver of the vehicle as the registered owner, Destiny Daniel.

#### Arrest of Destiny Daniel and Christopher Turner

9. Durham Police Department's (DPD) Selective Enforcement Team (SET) approached the Pilot in order to take Destiny Daniel into custody on her active state warrant. When they approached the vehicle, CHRISTOPHER LAWRENCE TURNER jumped out of the front passenger seat and attempted to run, but was immediately apprehended and detained on the passenger side of the Pilot. Destiny Daniel was taken into custody from the driver's seat of the Pilot.

#### Search of the Vehicle

10. In plain view on the front passenger seat of the vehicle where TURNER was sitting was a Palmetto State Armory Assault Rifle-style pistol, serial number X9-037179, loaded with an extended magazine containing 40 rounds of ammunition and one additional round chambered. A plastic sandwich bag containing 42.8 grams of marijuana was also located on the

ground next to the front passenger seat area near where TURNER was taken into custody.

11. In plain view on the driver's side floor board was a bag containing multiple other bags of mixed narcotics, a large amount of cash, and a Glock 43X, 9mm pistol, serial number CBGS716.

- a. The cash totalled \$3,156 in mixed denominations of US currency;
- b. The narcotics bag contained additional, smaller bags of the following:
  - i. Oxycodone, 31 dosage units;
  - ii. Alprazolam, 1 dosage unit;
  - iii. Brown unknown pill, 1 dosage unit;
  - iv. MDVP (Methylenedioxypyrovalerone), 29.2 grams;
  - v. Crack cocaine (field tested positive for the presence of cocaine), 14.8 grams;
  - vi. Buprenorphine Hydrochloride, 6 dosage units;
  - vii. Cocaine, 3.4 grams.

12. The vehicle was searched and 2 boxes of plastic sandwich bags were located in the glove box of the vehicle<sup>2</sup>.

Interview of Witness-1 and Witness-2

13. After DPD's SET had TURNER and Daniel in custody, they addressed an occupied vehicle on the driver's side of the Honda Pilot. Witness-1 was in the front passenger seat and Witness-2 was the driver of the vehicle. Witness-1 told police that he just purchased marijuana from TURNER and Daniel. Daniel told Witness-1 to meet them at the Jack's In and Out Mart for the deal. A plastic bag containing 2.8 grams of marijuana was located on the front passenger side floor board of the vehicle occupied by Witness-1 and Witness-2.

Search of 1403 Lincoln Street

14. A search warrant for TURNER and Daniel's residence was applied for and granted. An additional 28.2 grams of marijuana was located inside the house.

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<sup>2</sup> Based on my training and experience, I know that plastic sandwich bags are commonly used to package drugs prior to selling them.

Jail call made by Christopher TURNER

15. On June 12, 2024, at approximately 9:46p.m., TURNER placed a call from the Durham County Correctional Facility to phone number 984-312-1213 using phone Booking 3. It was determined to be TURNER based on the context of the call. The following words were exchanged with an unknown male (UM):

- a. 1:02 Turner – “What it is fool?”
- b. 1:05 UM – “Damn bitch, how’d they get you?”
- c. 1:10 Turner – “You already know how that shit go.”
- d. 1:11 UM – “What happened?”
- e. 1:15 Turner – “I was right there at the damn In and Out and they pushed the shit.”<sup>3</sup>
- f. 1:18 UM – “What they say though?”

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<sup>3</sup> TURNER and Daniel were arrested at Jack’s In and Out Mart, located at 911 Fayetteville Street.

- g. 1:22 Turner – “That I had a warrant and indicted two of them charges and shorty had some warrants also.<sup>4</sup>”
- h. 1:44 UM – “You ain’t have nothing on you?”
- i. 1:45 Turner – “Yea, hell yea.”
- j. 1:47 UM – “What you have?”
- k. 1:49 Turner – “Ummhmm.”
- l. 1:51 UM – “You had that ‘Yea’ on you?”
- m. 1:52 Turner – “Yea, hell yea.<sup>5</sup>”
- n. 1:53 UM – “Damn.”

#### Criminal History for Christopher Turner

16. TURNER has been convicted of multiple felonies. TURNER was convicted in Durham County Superior Court of felony breaking and entering a motor vehicle on October 8, 2015 and sentenced to a term of 5 to 15 months which was suspended and TURNER was placed on supervised probation for 24

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<sup>4</sup> Both TURNER and Daniel had outstanding state arrest warrants. From my training and experience, I know “Shorty” is a slang term commonly used to refer to a female and TURNER used it in this context to refer to Daniel.

<sup>5</sup> Based on my training and experience, I know it is common for subjects to use slang or code to indicate what they had in their possession at the time of their arrest to avoid saying it on a recorded jail call. TURNER was likely communicating that he had the AR Pistol on him at the time of his arrest using code.



months. On that same date, TURNER was also convicted of possession of firearm by felon and sentenced to a term of 9 to 20 months which was suspended and TURNER was placed on supervised probation for 24 months. On October 24, 2016, in Wake County Superior Court, TURNER was convicted for conspiracy to commit a robbery with a dangerous weapon and given an active sentence of 25 to 42 months. On November 15, 2016 in Durham County Superior Court, TURNER was convicted of conspiracy to commit robbery with a dangerous weapon and given an active sentence of 38 to 58 months.

17. As such, TURNER was previously convicted of a crime punishable by more than one year in prison and was aware of such status.

#### Firearms Nexus

18. On June 12, 2024, FBI Special Agent (SA) Eric Nye, a firearms nexus expert, examined the firearm seized from the passenger seat where TURNER was located and determined that it was a Palmetto State Armory, model PX9, 9mm AR-style pistol, serial number X9-037179. SA Nye determined the pistol is a firearm, as defined in 18 U.S.C. § 921(a)(3). SA Nye further determined that the Palmetto State Armory pistol was manufactured in West Columbia, South Carolina and therefore traveled in or affected interstate or foreign commerce prior to TURNER's possession of it in Durham North Carolina on June 12, 2024.

Conclusion

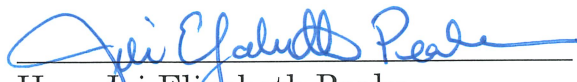
19. Based on the facts set forth above, I respectfully submit that there is probable cause to believe that on or about June 12, 2024, in Durham County, CHRISTOPHER LAWRENCE TURNER possessed a firearm after being convicted of a felony, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

Respectfully submitted,

/s/ Shaylin Laure  
Federal Bureau of Investigation  
United States Department of Justice

Dated: June 13, 2024

Pursuant to Rule 4.1 of the Federal Rules of Criminal Procedure, the affiant appeared before me via reliable electronic means (telephone), was placed under oath, and attested to the contents of this written affidavit.

  
Hon. Joi Elizabeth Peake  
United States Magistrate Judge  
Middle District of North Carolina